

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

(1) LARRY MATLOCK,)	
)	
Plaintiff,)	
)	
v.)	Case No. CIV-15-898-D
)	
(1) AMERICAN HEALTH AND LIFE)	
INSURANCE COMPANY,)	
)	
Defendant.)	

NOTICE OF REMOVAL

1. American Health and Life Insurance Company is the Defendant in a civil action brought against it in the District Court of Oklahoma County, State of Oklahoma, and titled *Larry Matlock v. American Health and Life Insurance Company*, Cause No. CJ-2015-4116;

2. At the time of filing this action and at the present time, Plaintiff was and is a resident and citizen of the State of Oklahoma. At the time of the filing of this action and at the present time, Petitioner was and is a corporation duly organized and existing under the laws of the State of Texas and no other state, with its principal place of business in Texas; it is not a citizen of Oklahoma.

3. Plaintiff claims to be entitled to recover an amount exceeding that specified by 28 U.S.C. §1332 to invoke federal diversity jurisdiction and, therefore, the amount in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

4. This is the kind of action of which the United States District Courts have original jurisdiction because of diversity of citizenship and sufficiency of amount in controversy.

5. The aforementioned action was commenced by service of summons upon Oklahoma Department of Insurance, as Service agent for Defendant, on July 31, 2015, and this Notice of Removal is, therefore, timely filed under the provisions of 28 U.S.C. § 1446.

6. Copies of all process, pleadings and orders filed or served upon Defendant in the aforementioned state action are attached hereto, marked a follows and made a part hereof.

- Exhibit 1 - Summons served on Okla. Insurance Commissioner (including cover letter sent to Defendant);**
- Exhibit 2 - Entry of Appearance of Steven S. Mansell;**
- Exhibit 3 - Entry of Appearance of Mark A. Engel;**
- Exhibit 4 - Petition;**
- Exhibit 5 - Plaintiff's First Set of Discovery to Defendant;**
- Exhibit 6 - State court docket sheet.**

Respectfully submitted,

s/Judy Hamilton Morse

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ATTORNEYS FOR DEFENDANT AMERICAN
HEALTH AND LIFE INSURANCE COMPANY

CERTIFICATE OF SERVICE

I certify that on the August 20, 2015 this Notice of Removal was filed in the United States District Court for the Western District of Oklahoma that a true and correct copy of said Notice of Removal was filed with the Court Clerk of Oklahoma County, Oklahoma County Courthouse, 320 Robert S. Kerr Ave, Oklahoma City, OK 73102 and was mailed, postage prepaid, to the following attorney for Plaintiff:

Steven S. Mansell
Mark A. Engel
MANSELL, ENGEL & COLE
101 Park Avenue, Suite 665
Oklahoma City, OK 73102

s/Judy Hamilton Morse

Judy Hamilton Morse